

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

ALLSTATE INSURANCE COMPANY;
ALLSTATE PROPERTY AND
CASUALTY INSURANCE COMPANY;
ALLSTATE FIRE AND CASUALTY
INSURANCE COMPANY; ESURANCE
INSURANCE COMPANY; and
ESURANCE PROPERTY AND
CASUALTY INSURANCE COMPANY,

Plaintiffs,

v.

ZMC PHARMACY, L.L.C. and JALAL
ZAWAIDEH, R.PH.,

Defendants.

C.A. No. 19-CV-13721-LVP-EAS

**INDEX OF EXHIBITS TO PLAINTIFFS' BRIEF IN SUPPORT OF
MOTION FOR CONTEMPT AND FOR SANCTIONS**

Exhibit	Description
A	Counsel for Allstate's Correspondence dated June 3, 2021 Addressing the Ongoing Discovery Deficiencies by the Defendants
B	Counsel for the Defendants' Correspondence dated June 16, 2021 Stating Counsel Still Has Not Addressed the Defendants' Deficiencies
C	Criminal Subpoenas Seeking Documents Relating to ZMC Pharmacy
D	ZMC Pharmacy Balance Sheet Email dated December 19, 2018
E	Direct Rx Invoice Submitted to ZMC Pharmacy Seeking Payment for a Management Fee
F	Email Correspondence from Jalal Zawaideh to Michael Gill, Alban Ivezaj, and Marko Berishaj at Direct Rx dated April 14, 2021

Exhibit	Description
G	Customer Compliance Questionnaire ZMC Pharmacy Submitted to Auburn Pharmaceutical Company Listing Its Referral and Business Sources
H	Invoices Identifying Costs and Bills Identifying Outrageous and Unreasonable Amounts Charged by the Defendants for Medications Billed to Allstate
I	Jalal Zawaideh's Supplemental Responses to Interrogatories
J	Email Chain Correspondence Referencing Jalal Zawaideh's "Case Management Referral Team"
K	Evidence of Email Address Not Identified By Jalal Zawaideh

Respectfully submitted,

SMITH & BRINK

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Dated: June 22, 2021